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JOEL KOHN Interim Executive Director

October 23, 1991

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Administrative Record

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed your July 17, 1991 submittal regarding the Administrative Record (AR) File Index for the Site-Wide and Operable Unit 1 files and the Summary of Administrative Record Procedures. Because the Site-Wide and Operable Unit 1 document listings are dated February 14, 1991 and have no doubt been updated, the Division confined our review to the AR Procedures.

Overall, the Division considers the approach presented in the AR Procedures to be adequate. However, we would like to point out that OSWER Directive 9833.3A-1 (included in your submittal) states that any relevant RCRA information should be included in the AR (Section III.M). As the State has recently issued a RCRA Hazardous Waste Permit to RFP, the AR should now include all permit and permit related documents, inspection reports, RCRA facility Assessments, and RCRA Facility Investigations. In addition, relevant information on waste management, types of wastes, and quantity of wastes should be included.

The Division would like to point out that the IAG requires DOE to update the AR on at least a quarterly basis. We would also point out that the Site-Wide and OU 1 listings presented in the July 17, 1991 submittal were incomplete. We look forward to reviewing the next update, which should cover all the OUs and site-wide documents as well as the permit-related documents, for completeness.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,

Gary W. Baughman

Unit Leader, Hazardous Waste Facilities

Hazardous Materials and Waste Management Division

Martin Hestmark, EPA cc: Rich Schassburger, DOE Daniel S. Miller, AGO Barbara Barry, RFPU